

201-14928

Anh Nguyen

12/19/03 06:24 AM

To: NCIC HPV@EPA

cc:

Subject: rapa: HPV Challenge Program Submission for N-oxydiethylenethiocarbamyl
-N'-oxydiethylenesulfenamide (OTOS), CAS No. 13752-51-7

----- Forwarded by Anh Nguyen/DC/USEPA/US on 12/19/2003 06:21 AM -----



Anne_LeHuray@american
chemistry.com

12/18/2003 01:38 PM

To: NCIC OPPT@EPA, Rtk Chem@EPA

cc: Jim_Keith@americanchemistry.com

Subject: rapa: HPV Challenge Program Submission for N-oxydiethylenethiocarbamyl
-N'-oxydiethylenesulfenamide (OTOS), CAS No. 13752-51-7

Please find attached the RAPA Panel's submission to the US HPV Challenge Program for N-oxydiethylenethiocarbamyl-N'-oxydiethylenesulfenamide (OTOS), (CAS No. 13752-51-7), consisting of a cover letter, the test plan and robust summaries in a IUCLID-formatted file. As explained in the attached documentation, this is a partial revision of a previous submission, as OTOS was originally included in the Sulfenamide Accelerator category.

The signed letter is included in the hard copy of this submission sent to the Merrifield Post Office address.

(See attached file: rapa_otos_testplan_121803.pdf) (See attached file: rapa_otos_iuclid_121803.pdf) (See attached file: rapa_otos_cvrltr_121803.pdf)

Please let me know if there are difficulties with this transmission.

Anne P. LeHuray, Ph.D.
American Chemistry Council
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Arlington, Virginia 22209
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fax: (703) 741-6630

e-mail: anne_lehuray@americanchemistry.com rapa_otos_testplan_121803.p

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201-14928

December 18, 2003

Via US Mail and e-mail

Administrator, Michael Leavitt
U.S. Environmental Protection Agency (EPA)
P.O. Box 1473
Merrifield, VA 22116

RECEIVED
OPPT/ODIC
03 DEC 19 PM 12:24

**Re: Rubber and Plastic Additives (RAPA) Panel,
Partial Revision of HPV Chemical Challenge Program Submission
N-oxydiethylenethiocarbamyl-N'-oxydiethylenesulfenamide (OTOS), CAS No.
13752-51-7 (Formerly included in the Sulfenamide Accelerators Category)
Revised Test Plan and Robust Summaries**

Dear Administrator Leavitt:

The RAPA Panel of the American Chemistry Council is pleased to submit the attached revised documents to the High Production Volume (HPV) Chemical Challenge Program (Program) to fulfill our commitment for one of the 37 chemicals the RAPA Panel is voluntarily sponsoring in the Program. The RAPA Panel consists of the following member companies: Alco Chemicals; Bayer Polymers LLC; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.

This submission consists of a Test Plan and Robust Summaries for N-oxydiethylenethiocarbamyl-N'-oxydiethylenesulfenamide (OTOS; CAS No. 13752-51-7), and constitutes part of a revision of documents previously submitted to the Program by the RAPA Panel. In the previous submission, dated December 3, 2001, OTOS was included in a category called "Sulfenamide Accelerators." After considering comments received, the Panel reconfigured the category and revised documentation for OTOS, which is now submitted as a single chemical rather than as part of a category. This current submission reflects consideration of comments received from EPA (dated August 14, 2002) and from Environmental Defense (dated May 7, 2002). While chemistry and hazard information for the chemicals in the former Sulfenamide Accelerators category overlap, the Panel is submitting revised documentation for the two sponsored category chemicals individually to more clearly explain and substantiate the data. Documentation for the remaining former category member [2-(morpholinothio)-Benzothiazole (MBS; CAS number 102-77-2)] was submitted separately on August 25, 2003.

In addition to the *Revised Test Plan*, please also find attached robust summaries contained in IUCLID-formatted documents for OTOS.

Administrator Michael Leavitt
RAPA-HPV
December 18, 2003
Page 2 of 2

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact,
Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments